UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 07 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7669 2236
RETURN RECEIPT REQUESTED

Christine (Tina) Reese
Project Manager/Hydrogeologist
Symbiont
6737 West Washington Street
Suite 3440
Milwaukee, Wisconsin 53214

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Trent Tube Plant #1
EPA I.D. No.: WID006097281

Dear Ms. Reese:

On February, 13, 2013, a representative of the U.S. Environmental Protection Agency Region 5 and Wisconsin Department of Natural Resources inspected Trent Tube Plant #1 (Trent Tube), located at 2188 Church Street in East Troy, Wisconsin. The purpose of the inspection was to evaluate Trent Tube Plant's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a large quantity generator of such wastes. We have enclosed a copy of the EPA inspection report and checklists for your reference.

Based on information provided by Trent Tube Plant personnel, a review of records and personal observations by inspectors, EPA finds Trent Tube Plant is engaged in the management of hazardous waste and is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Wisconsin Administrative Code (WAC). Specifically, we find that Trent Tube is in violation of the following hazardous waste requirements:

1. A generator who transports, or offers for transport a hazardous waste for off-site treatment, storage, or disposal, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, according to the instructions included in the appendix to 40 C.F.R. part 262. See, WAC NR § 662.020(1) [40 C.F.R. § 262.20]. The specific manifest requirements include but are not limited to reading, signing, and dating the waste minimization certification statement.

The review of manifest tracking numbers 0030677844JJK, 001549988GBFF, and 003067843JJK indicated the generator had not dated the manifests. Trent Tube, therefore, violated the above- reference generator manifest requirements.

2. A generator shall, for shipments of hazardous waste outside of Wisconsin, submit a copy of each manifest to the Department within 30 days of receiving the signed copy from the designated facility. See, WAC NR § 662.023(3) [40 C.F.R. § 262.23(3)].

   The review of manifest indicated that there were out-of-state manifests that were not sent to WDNR within thirty days of receiving a signed copy from the designated facility. WDNR Manifest Records for Selected Generator Shipped Between 02/01/2010 and 02/01/2013 Report indicated the following missing manifests: (1) 003067853JJK (shipment date 01/09/13; (2) 003067840JJK (shipment date 02/25/10; (3) 003067844 (shipment date 03/28/11); and (4) 003067843 (shipment date 03/28/11). Trent Tube, therefore, violated the above-referenced generator manifest requirements.

3. A generator must mark each package of hazardous waste in accordance with the applicable Department of Transportation regulations on hazardous materials under 49 CFR part 172 before transporting or offering hazardous waste for transportation off-site. See, WAC NR § 662.032(1) [40 C.F.R. § 262.32].

   At the time of the inspection, a container was not marked with the U.S. DOT proper shipping name and identification number as identified in 49 CFR 172. Trent Tube, therefore, violated the above-referenced generator pre-transport requirements. However, on May 13, 2013, a photograph was forwarded to document the marking of the container with the shipping name and identification number. Therefore, no further action is required to comply with this requirement.

4. A generator must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to an on-site or off-site treatment, storage, or disposal. See, WAC NR § 668.07(1)(h) [40 CFR § 268.7(a)(8)].

   A review of hazardous waste records did not show record or notice of a determination made on whether the listed hazardous waste needed to be treated or not before it could be land disposed. Thus, there was no land disposal restriction notification available for hazardous waste listed in the following manifests: (1) 003067915JJK; (2) 003067840JJK; (3) 002684092JJK; (4) 003067839JJK; (5) 003067836JJK; (6) 003067841JJK; (7) 008337137JJK; (8) 007863229JJK; (9) 003067853JJK; (10) 008434418JJK; (11) 002684052JJK; 003067843JJK; (12) 001549988GBF; and (13) 003067844JJK. Trent Tube, therefore, violated the above-referenced land disposal restriction requirements.

5. In order to avoid the need for a hazardous waste storage operating license, a large quantity generator using containers to accumulate hazardous waste must inspect the areas where containers are stored at least weekly. See, WAC NR § 662.034(1)(a)1 [40 CFR §

262.34]. This is also a requirement of owners and operators of hazardous waste storage facilities that store hazardous waste, under WAC NR § 662.0174 [40 CFR § 265.174].

Review of records provided indicated containers storing hazardous waste in the 90-day storage area were not inspected weekly. Trent Tube, therefore, violated the above-referenced condition for a storage license exemption, and violated the storage facility container area inspection requirement.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements.

You should submit your response to Cindy Dabner, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions or concerns regarding this letter, please contact Cindy Dabner, of my staff, at 312-886-5890.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

cc: Dolores Hayden, WDNR – Southeast Region Headquarters
dolores.hayden@wisconsin.gov

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: TRENT TUBE PLANT No. 1

EPA ID NUMBER: WID006097281

ADDRESS: 2188 Church Street, East Troy, WI 53120

DATE OF INSPECTION: February 13, 2013

EPA INSPECTOR: Cindy Dabner
Environmental Scientist

PREPARED BY:

Cindy Dabner
Compliance Section 2

2/19/14
Date

ACCEPTED BY:

Julie Morris, Chief,
Compliance Section 2

2/24/14
Date

Purpose of the Inspection

This inspection was an evaluation of Trent Tube Plant No. 1's compliance with hazardous waste regulations found at Wisconsin Administrative Code Chapter Nature Resources (WAC NR) 660 through 679 and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection with Inspector Dolores Hayden of the Wisconsin Department of Natural Resources. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector
Cindy Dabner, U.S. EPA Region 5

State of Wisconsin Department of Natural Resources (WDNR) Inspector
Dolores Hayden, WDNR

Trent Tube Plant No. 1 Representative
Tina Reese, Project Manager, Hydrogeologist P.G., Symbiont

Introduction

On February 13, 2013, Inspectors Dabner arrived to the site at approximately 9:50 a.m. However, upon arrival to the site, the inspector noticed a vacant lot. Both Inspector Hayden and Inspector Dabner contacted the facility representative, Ms. Tina Reese. Ms. Reese informed the inspectors that her office was located nearly an hour away from the facility. At approximately 1:00 pm, Ms. Reese arrived to the site the inspection.

The inspection began with an opening conference, Inspector Dabner inquired about the safety measures required to conduct during the inspection tour. She also discussed confidential business information (CBI) and the use of a camera during the inspection. Trent Tube Plant No. 1 did not make any CBI claims on: (1) the information provided to the inspectors; or (2) photographs taken during the inspection. Inspector Dabner provided a Small Business Resources information Sheet and Pollution Prevention Brochure to Ms. Reese.

Site Description

Trent Tube Plant No. 1 consists of an 11- acre parcel of land that is bounded on the south and the east by Honey Creek, to the west and Highway G, and to the north Trent Street. The three standing buildings included Building#1, Building#2 and the Skimmer Building. Trent Tube Plant 1 is no longer an operating manufacturing facility. The manufacturing process ceased in 1995 and the building was demolished in 1998. Previous facility activities included industrial manufacturing of stainless steel tubing. The manufacturing impacts to soil, groundwater, and

sediment at the site and the adjacent wetland includes residual pickling acids, volatile organic compounds, polynuclear aromatic hydrocarbons, and heavy metals.

Trent Tube Plant No. 1 property has an active a groundwater extraction and treatment system that was designed and installed to minimize the migration of impacted groundwater to Honey Creek. Hazardous waste is generated as a result of the remediation of contaminated soil, sediment, and groundwater.

The hazardous waste streams generated at Trent Tube Plant No. 1 includes the following: (1) personal protective equipment (PPE) (F001 and F002); (2) free product (D040 and F002); (3) system sludge (F002); and (4) spent granite active carbon (F002, F001, U226, and U228).

Site Tour

Ms. Reese escorted Inspector Hayden and Inspector Dabner to Building #2. According to the facility representative, hazardous is only stored in Building #2. The approximate size of Building #2 is 24' x 26'. In Building #2, Inspector Dabner observed two 55-gallon drums, three processing tanks, a settlement tank, and a treatment tank. Pictures were taken of the tanks and two 55-gallon drums. See Photographs#5-14.

In Building #2, the inspector observed Drum#1 located in the 90 Day Container Accumulation Area. Ms. Reese informed Inspector Dabner that the Drum#1 contained system sludge waste. Ms. Reese opened Drum#1. Inspector Dabner observed Drum#1 filled to capacity with what appeared to be system sludge. See Photographs#5-8. Drum#1 was marked as hazardous waste with EPA Waste Codes F001, F002, U226, and U228. The accumulation start date was marked 12/18/12. The Inspector did not observe information concerning the Department of Transportation (DOT) proper shipping name.

The inspection moved to Drum#2 in Building #2. Ms. Reese informed Inspector Dabner that the Drum#2 contained PPE and filters. See Photographs#9-10. When the drum was opened, the Inspector observed a 55-gallon drum not filled to capacity. Drum#2 was marked with an accumulation start date of 6/1/12. Drum#2 was labeled EPA Waste Codes F001, F002, U226, and U228. The DOT proper shipping name was marked as PPE and filters. See Photographs#3-4.

The inspector observed the water treatment system. See Photograph#11-12.

The inspection proceeded to a Recovery Well located behind Building #2. Ms. Reese informed the inspector that impacted groundwater is recovered at this well to be treated. Ms. Reese also explained that free product is recovered from RW#3. RW#3 is located along the bank area. No free product was observed in RW#3 at the time of the inspection. See Photograph#11-13.

During the inspection, the Inspectors observed fire extinguishers, spill control equipment, internal communications systems, and alarm systems in Building #2.

Record Review

During the inspection, the Inspectors requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, and personnel training records for the past three years. The inspector reviewed available hazardous waste manifest, land disposal restriction records, and material data sheets during the inspection. The facility was determined to be an episodic large quantity generator three times out of the year.

Weekly Inspection Logs:

The inspector observed one 55 gallon drum stored in the 90 Day Storage Accumulation Area. Weekly Inspection logs were not made available at the time of the inspection.

The Inspectors noted some discrepancies with the Hazardous Waste Manifest:

Manifest Tracking Number	**Discrepancy**
003067844JJK	Manifest not forwarded to WDNR according to WDNR HW Manifest Report 01/01/2008 thru 02/04/2013; Designated Facility: Siemens Water Technologies Darlington, PA 26115 (3/28/11) Spent Activated Carbon Generator date none; Transporter date 03/22/11; Designated Treatment Facility date 03/28/11
003067853JJK	Manifest not forwarded to WDNR according to WDNR Report 01/01/2008 thru 02/04/2013; Designated Facility: Siemens Industry, Inc Water Darlington, PA 26115 Spent Carbon with TCE Generator date 10/17/12; Transporter date 12/17/12; Designated Treatment Facility date 1/9/13
003067843JJK	Manifest not forwarded to WDNR according to WDNR Report 01/01/2008 thru 02/04/2013; Designated Facility: Siemens Water Technologies Darlington, PA 26115 Spent Carbon with TCE Generator date none; Transporter date 03/22/11; Designated Treatment Facility date 03/28/11

001549988GBF	Designated Facility: Badger Disposal of WI, Milwaukee, WI Manifest not signed by the Designated Facility Generator date none; Transporter date 8/29/11; Designated Treatment Facility date none
003067840JJK	Manifest not forwarded to WDNR according to WDNR HW Manifest Report 01/01/2008 thru 02/04/2013; Designated Facility: Michigan Disposal Waste Treatment Plant, Belleville, MI Systems Sludge Generator date 08/12/10; Transporter date 08/18/10; Designated Treatment Facility date 08/25/10

Land Disposal Restriction Review:

Manifest Tracking #	**LDR**
003067915JJK	Not available
003067840JJK	Not available
002684092JJK	Not available
003067839JJK	Not available
003067836JJK	Not available
003067841JJK	Not available
008337137JJK	Not available
001686500GBF	Not available
007863229JJK	Not available
003067853JJK	Not available
008434418JJK	Not available
002684052JJK	Not available
003067843JJK	Not available
001549988GBF	Not available
003067844JJK	Not available

Closing Conference

A closing conference was conducted with Ms. Reese. Inspector Dabner summarized the areas of concern noted during the inspection, and explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection. The inspection concluded at approximately 3:45 p.m.

Post-Inspection

Prior to completion of this inspection report, Ms. Reese provided Inspector Dabner supplemental information. Training records, contingency plan and emergency procedures, and 2011 hazardous

waste manifest, land disposal restriction forms, and hazardous waste profiles were forwarded to the Inspector following the inspection. Supplemental information is provided in Attachment E-Trent Tube Post-Inspection Document Log.

Attachments

A. Trent Tube Plant#1 Inspection Photographs
B. Trent Tube Plant#1 Photograph Log
C. WDNR Large Quantity Generator Inspection Checklist
D. Trent Tube Plant#1 Document Log
E. Trent Tube Plant#1 Post-Inspection Document Log

ATTACHMENT A

Trent Tube Plant#1 Inspection Photographs

WID006097281

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #1
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Entrance to Trent Tube Plant #1

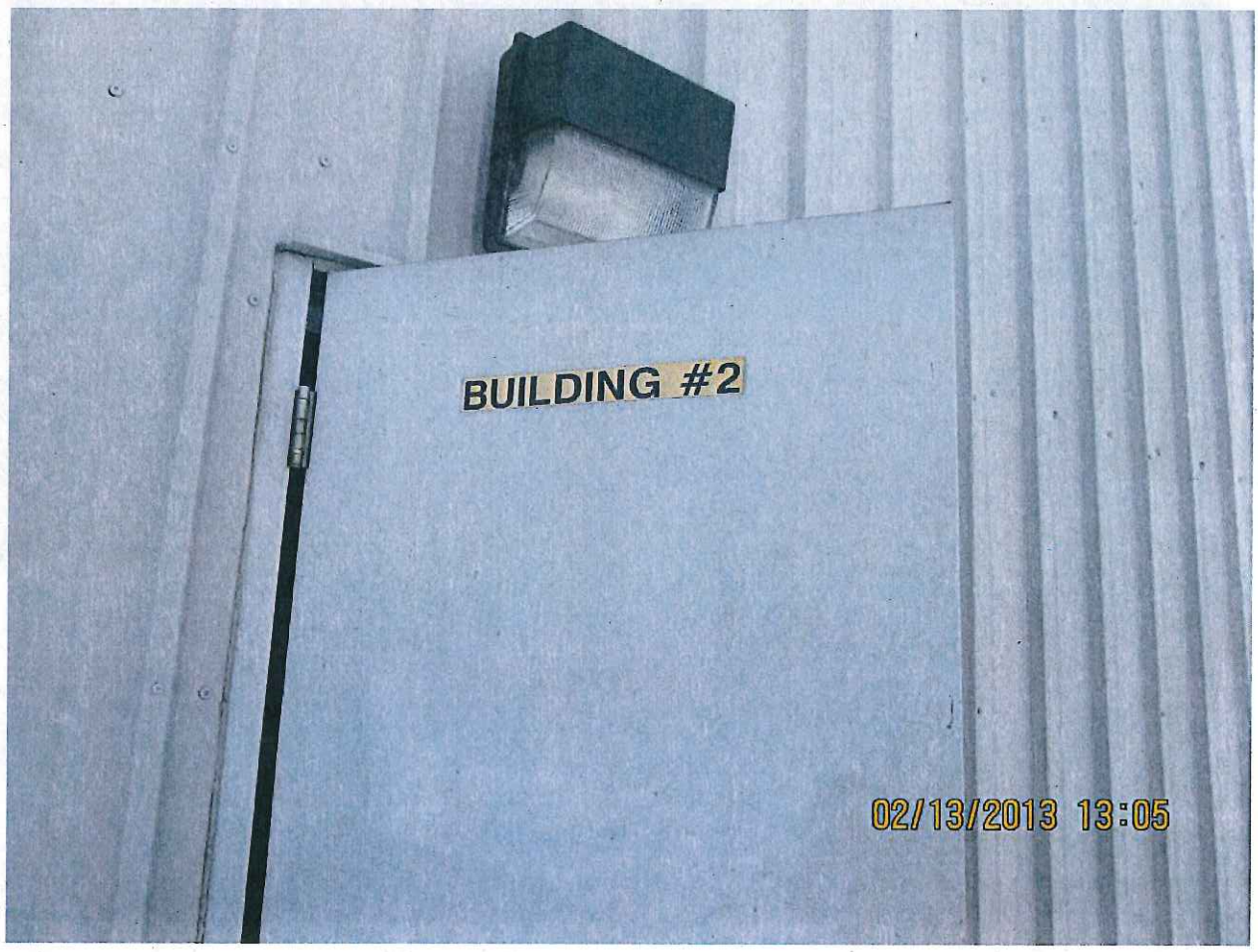
Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: # 2
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Gate Entrance to Trent Tube Plant#1

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #3
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Entrance to Accumulation Area Center located in Building #2

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013



Photograph#4
Name of Photographer: Cindy Dabner
Date/Time of Photograph:
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Building #2 Entrance Door

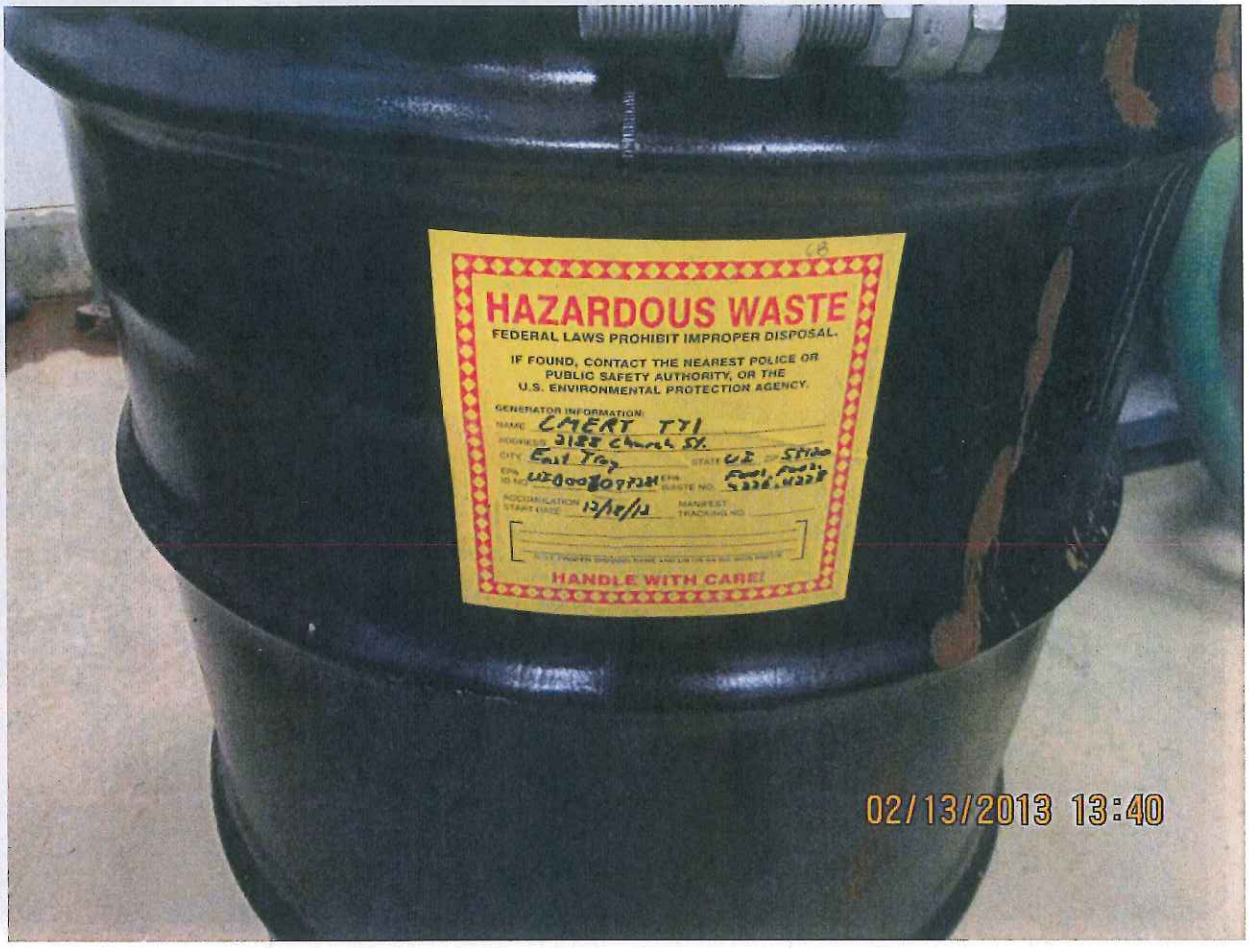
Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #5
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Accumulation Area Center with two 55 gallon drums storing hazardous waste

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #6
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Two 55 gallon drums storing hazardous waste

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013



Photograph: #7
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Drum#1 Hazardous Waste Label with Accumulation Start Date 12/18/12

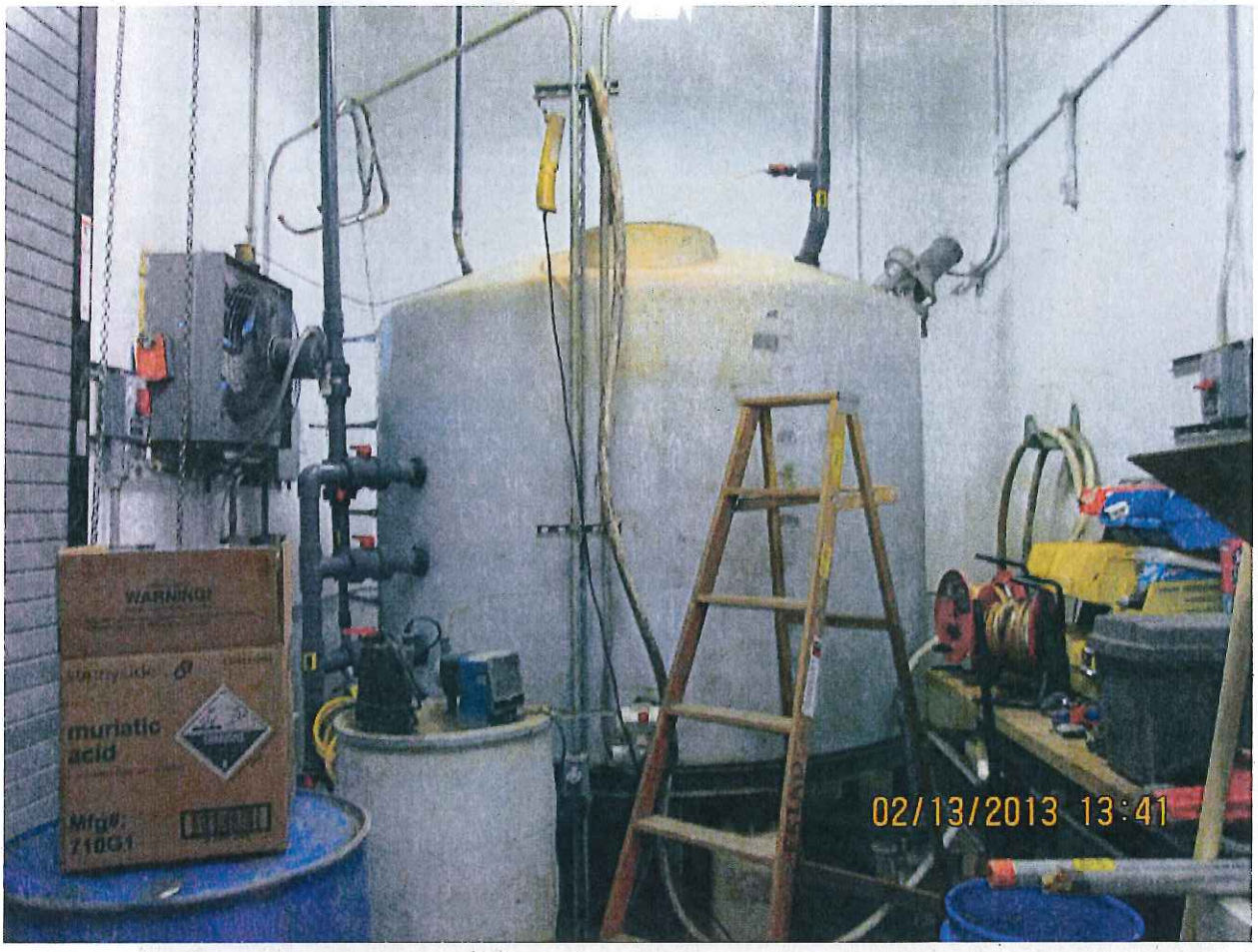
Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #8
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Drum#1 and Drum#2

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #9
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Drum#2 Hazardous Waste Label with Accumulation Start Date 6/1/12

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013



Photograph: #10
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Wastewater Treatment System Located in Building #2

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #11
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Wastewater Treatment System Components

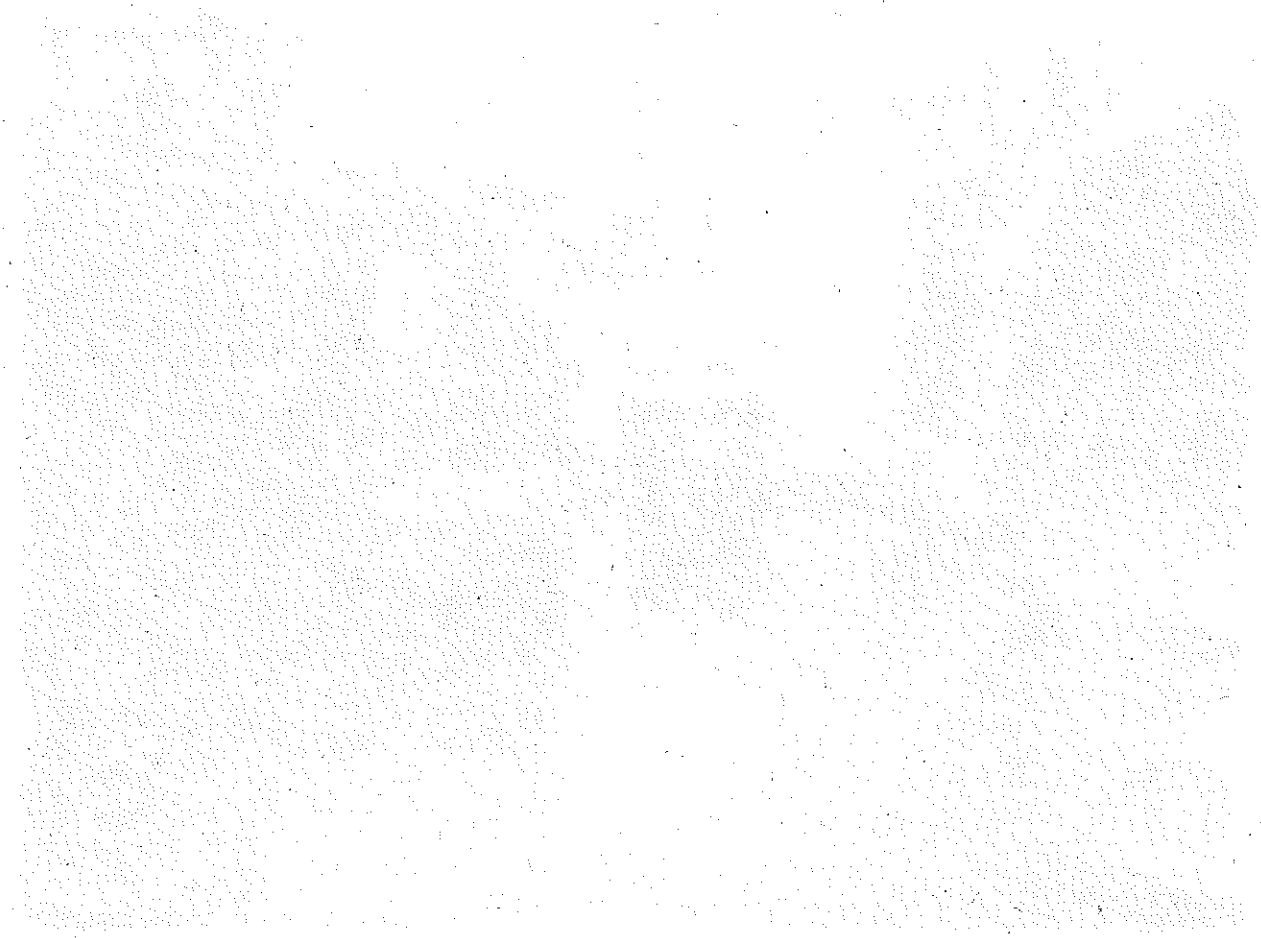
Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #12
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Recovery Well Located Behind Building #2

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013

Photograph: #13
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: Groundwater Extraction and Treatment System Located in Building #2

Attachment A
Photographs for Trent Tube Plant #1 RCRA CEI
WID 006 097 281
February 13, 2013



ATTACHMENT B

Trent Tube Plant#1 Photograph Log

WID006097281

Attachment B- Trent Tube Plant No. 1 Photograph Log WID006097281

Photographer: US EPA Inspector Cindy Dabner

Location: Trent Tube Plant No. 1, 2188 Church Street, Eat Troy, WI 53120

Date(s): February 13, 2013

Photo #	Description	Date and Time
1	Entrance to Trent Tube Plant#1	2/13/13
2	Gate Entrance to Trent Tube Plant#	2/13/13
3	Entrance to Accumulation Area Center located in Building #2	2/13/13
4	Building #2 Entrance Door	2/13/13
5	Accumulation Area Center with two 55 gallon drums storing hazardous waste	2/13/13
6	Two 55 gallon drums storing hazardous waste	2/12/13
7	Drum#1 Hazardous Waste Label Accumulation Start Date 12/18/12	2/12/13
8	Drum #1 and Drum# 2	2/12/13
9	Drum#2 Hazardous Waste Label Accumulation Start Date 6/1/12	2/12/13
10	Waste Water Treatment System Located in Building #2	2/12/13
11	Wastewater Treatment System Components	2/12/13
12	Recovery Well located Behind Building #2	2/12/13
13	Groundwater Extraction and Treatment System Located in Building #2	2/12/13

ATTACHMENT C

WDNR Large Quantity Generator Inspection Checklist

Trent Tube Plant#1WID006097281

LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011 Photo☐
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. Badger Lab, Cardinal Lab, Common Wealth Technology Inc, Test America	Y	662.011(3)(a)1 Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo☐
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1) Photo☐
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	N	662.020(1) Photo☐
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo☐
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	N	662.023(3) Photo☐
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	NA	662.020(1) Photo☐
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13) Photo☐
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13) Photo☐
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo☐
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo☐
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo ☐
L. Hazardous waste is marked according to applicable DOT requirements before transport.	N	662.032(1) Photo ☐
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo ☐
N. Placards are offered to the initial transporter.	NA	662.033 Photo ☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo ☐
B. Generator complies with the prohibition against dilution of wastes.	NA	668.03 Photo ☐
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo ☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	NA	668.07(1) Photo ☐
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N	668.07(1) Photo ☐
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	N	668.07(1) Photo ☐
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	N	668.07(1)(h) Photo ☐
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo ☐
I. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	NA	668.09(2) Photo ☐
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d) Photo ☐

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041 Photo☐
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1) Photo☐
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2) Photo☐
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d) Photo☐
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d) Photo☐
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d) Photo☐

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d) Photo☐

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d) Photo ☐
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	Y	662.034(1)(d) Photo ☐
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	Y	662.034(1)(d) Photo ☐
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d) Photo ☐
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	Y	662.034(1)(d) Photo ☐
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d) Photo ☐

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo☐
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo☐
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo☐
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d) Photo☐
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	NA	662.034(1)(d) Photo☐
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo☐
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d) Photo☐
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d) Photo☐
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d) Photo☐

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo☐
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b) Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo☐

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(1)(a)1 Photo ☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1 Photo ☐
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1 Photo ☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1 Photo ☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N	662.034(1)(a)1 Photo ☐
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	NA	662.034(1)(a)1 Photo ☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.034(1)(a)1 Photo ☐
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.034(1)(a)1 Photo ☐
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	NA	662.034(1)(a)1 Photo ☐

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	NA	 Photo ☐
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).	NA	662.034(1)(a) Photo ☐
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo ☐
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo ☐

Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.	NA	662.034(1)(a) Photo☐
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.	NA	662.034(1)(a) Photo☐
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).	NA	662.034(1)(a) Photo☐
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.	NA	 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	NA	 Photo☐
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	NA	 Photo☐
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	NA	662.034(1)(a)1 Photo☐
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	NA	 Photo☐
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	NA	 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	NA	Photo☐
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.	NA	Photo☐
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	NA	662.034(1)(a)1 Photo☐
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	NA	662.034(1)(a)1 Photo☐
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	NA	662.034(1)(a)1 Photo☐
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	NA	662.034(1)(a)1 Photo☐
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	NA	662.034(1)(a)1 Photo☐
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	NA	662.034(1)(a)1 Photo☐
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	NA	662.034(1)(a)1 Photo☐
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	NA	662.034(1)(a)1 Photo☐
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1 Photo☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	NA	Photo☐
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2 Photo☐
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2 Photo☐
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2 Photo☐
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2 Photo☐
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2 Photo☐
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2 Photo☐
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2 Photo☐
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2 Photo☐

Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	NA	662.034(1)(a)2 Photo☐
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)	NA	662.034(1)(a)2 Photo☐
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)	NA	662.034(1)(a)2 Photo☐
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)	NA	662.034(1)(a)2 Photo☐

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	NA	 Photo☐
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo☐
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2 Photo☐
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo☐
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2 Photo☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	 Photo☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a) Photo☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a) Photo☐
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	NA	662.034(3)(a)1 Photo☐

Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(3)(a)1 Photo ☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1 Photo ☐
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2 Photo ☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	NA	662.034(3)(b) Photo ☐
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	NA	662.034(3)(b) Photo ☐

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	NA	662.041(3)(e) Photo ☐
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	NA	662.027(1) Photo ☐

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	NA	 Photo ☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2 Photo ☐
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2) Photo ☐
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a) Photo ☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.		679.24 Photo ☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.		 Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	NA	679.23 Photo ☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	679.11 Photo ☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.	NA	 Photo ☐
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7) Photo ☐
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a) Photo ☐
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b) Photo ☐
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c) Photo ☐
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a Photo ☐
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3 Photo ☐
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b Photo ☐
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4 Photo ☐
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c Photo ☐
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5 Photo ☐
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8) Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	X	662.034(1) Photo ☐
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	X	 Photo ☐
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).	NA	 Photo ☐
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	NA	662.034(1)(a)2 Photo ☐

ATTACHMENT D

Trent Tube Plant#1 Documentation Log

WID006097281

Attachment D- Trent Tube Plant No. 1 Inspection Documentation Log WID006097281

Inspection Date: February 13, 2013 Submission Date: February 25, 2013 and May 10, 2013

Document Description
Confirmation of Acceptability of Free Product to EQ Resources Recovery Inc
Hazardous Manifest# 001686500 GBF
LDR Restriction Notification Form for Manifest# 001686500GBF
Hazardous Waste Profile for PPE w/Trace Contamination
Hazardous Waste Report Certification 2012
Hazardous Waste Training Certificates
Health and Safety Training Record Feb 2013
Analytical Report for Free Product
Preliminary Report of Test Results for Halogenated Solvent
Hazardous Waste Profile for Vinyl Chloride Contaminate Sludge
2011 Comprehensive Biennial Report
Hazardous Manifest# 008434418JJK
Hazardous Manifest# 001549988GBF
Hazardous Manifest #002684052JJK
Hazardous Waste Annual Report Records for Selected Generator 02/05/2013
LDR Restriction Notification Form F001, F002, U226, U228 7-23/01
Hazardous Waste Report Certification 2010
Hazardous Manifest# 003067839JJK
Hazardous Manifest# 003067836JJK
Hazardous Manifest# 003067840JJK
Hazardous Manifest# 003067841JJK
Hazardous Manifest# 003067915JJK
Hazardous Manifest# 002684092JJK
Hazardous Waste Report Certification 2011
Hazardous Manifest# 003067844JJK
Hazardous Manifest# 008434418JJK
Hazardous Manifest# 002684052JJK
Hazardous Manifest# 003067843JJK
Hazardous Manifest# 001549988GBF
Updated pages for Contingency Plan

ATTACHMENT E

Trent Tube Plant#1 Post-Inspection Log

WID006097281

Attachment E- Trent Tube Plant No. 1 Post-Inspection Documentation Log WID006097281

Inspection Date: February 12, 2013 **Submission Date: May 2013**

Description
LDR Restriction Notification Form for Manifest# 001686500GBF
Re-evaluation of Free Product
Hazardous Waste Report Data TTR RY2012
Crucible Materials Corporation Environmental Response Trust
Corrected Hazardous Waste Label
Hazardous Waste Report 2012

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

EPA ID: WID006097281
Facility Name: TRENT TUBE PLANT 1
Location Address: 2188 CHURCH ST
EAST TROY, WI 53120-

Contact Person: TINA REESE, CONSULTANT
6737 W WASHINGTON ST STE 3440
WEST ALLIS, WI 53214-
Phone: (414) 291-8840 ext: 1105

FID: 265005510
SIC Code: 3317
County: WALWORTH

Activity	License Number	Expiration Date
201 HW Generator - Large		
297 Hazardous Waste Report Certifier		
298 Hazardous Waste Report Preparer		

007863229JJK Shipped: 09/19/2012 COPY 3 DNR Received: 10/05/2012 Batch/Seq: 1725 / 812
Received: 09/21/2012 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	09/19/2012

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	1000 P	1,000
			Manifest Lbs. Total	1,000

NO SECONDARY COPY AVAILABLE

001686500GBF Shipped: 05/22/2012 COPY 3 DNR Received: 06/12/2012 Batch/Seq: 1669 / 32
Received: 05/22/2012 TSD EPA ID: WID988580056 TSD Facility Name: BADGER DISPOSAL OF WI INC

Transporter EPA ID	Transporter Name	Transporter Date
WID988580056	BADGER DISPOSAL OF WI INC	05/22/2012

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	2	D043- VINYL CHLORIDE	55 G	459
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	110 G	917
			Manifest Lbs. Total	1,376

NO SECONDARY COPY AVAILABLE

HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

EPA ID: WID006097281
Facility Name: TRENT TUBE PLANT 1
Location Address: 2188 CHURCH ST
EAST TROY, WI 53120

Contact Person: TINA REESE, CONSULTANT
6737 W WASHINGTON ST STE 3440
WEST ALLIS, WI 53214
Phone: (414) 291-8840 ext: 1105

FID: 265005510
County: WALWORTH

Report Year 2005

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33121(

FW Total Lbs Generated: 13,113 Lbs Recycled: 8,213 Lbs Leachate: 0 Lbs Repaired: 4,900 Lbs HHHW: 0 Net Lbs Subject To Fee: 0

GM F001 PERSONAL PROTECTIVE EQUIPMENT (PPE)/FILTERS
Amount Generated: 1,300 LBS LBS Generated: 1,300 LBS Shipped: 1,600
Offsite Mgt. Method Type: Macro-encapsulation prior to disposal at another site
Shipped To: MID000724831

GM F001 FREE PRODUCT
Amount Generated: 155 GAL LBS Generated: 20 LBS Shipped: 20
Offsite Mgt. Method Type: Fuel blending prior to energy recovery at another site
Shipped To: MID060975844

GM F001 SPENT GRANULAR ACTIVATED CARBON
Amount Generated: 6,200 LBS LBS Generated: 6,200 LBS Shipped: 7,850
Offsite Mgt. Method Type: Other recovery or reclamation for reuse incl acid regeneration,
Shipped To: AZD982441263

GM F001 SYSTEM SLUDGE
Amount Generated: 3,600 LBS LBS Generated: 3,600 LBS Shipped: 3,600
Offsite Mgt. Method Type: Stabilization or chemical fixation prior to disposal at another sit
Shipped To: MID000724831

GM Total Lbs Generated for Year 2005: 11,120

Report Year 2004

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33121(

FW Total Lbs Generated: 82,793 Lbs Recycled: 16,113 Lbs Leachate: 0 Lbs Repaired: 66,680 Lbs HHHW: 0 Net Lbs Subject To Fee: 0

Report Year 2003

IC Gen. Cat: LQG Stor. Code: NO LIC. STOR. Lic. TDR: NONE, NO PLANS TO DEV. Lic. Ex. TDR: NONE, NO PLANS TO DEV. SIC/NAICS Code: 33121(

FW Total Lbs Generated: 41,692 Lbs Recycled: 11,692 Lbs Leachate: 0 Lbs Repaired: 30,000 Lbs HHHW: 0 Net Lbs Subject To Fee: 0

GM F001 PERSONAL PROTECTIVE EQUIPMENT (PPE)/FILTERS
Amount Generated: 600 LBS LBS Generated: 600 LBS Shipped: 600
Offsite Mgt. Method Type: Macro-encapsulation prior to disposal at another site
Shipped To: MID000724831

GM F001 FREE PRODUCT
Amount Generated: 110 GAL LBS Generated: 13 LBS Shipped: 13
Offsite Mgt. Method Type: Fuel blending prior to energy recovery at another site
Shipped To: MID060975844

GM F001 SPENT GRANULAR ACTIVATED CARBON
Amount Generated: 10,350 LBS LBS Generated: 10,350 LBS Shipped: 10,350
Offsite Mgt. Method Type: Other recovery or reclamation for reuse incl acid regeneration,
Shipped To: AZD982441263

GM F001 SYSTEM SLUDGE
Amount Generated: 29,400 LBS LBS Generated: 29,400 LBS Shipped: 29,400
Offsite Mgt. Method Type: Stabilization or chemical fixation prior to disposal at another sit
Shipped To: MID000724831

GM Total Lbs Generated for Year 2003: 40,363

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

008337137JJK Shipped: 03/14/2012 COPY 3 DNR Received: 04/11/2012 Batch/Seq: 1633 / 637
Received: 03/16/2012 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	03/14/2012

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	4000 P	4,000
			Manifest Lbs. Total	4,000

NO SECONDARY COPY AVAILABLE

002684049JJK Shipped: 11/30/2011 COPY 3 DNR Received: 01/06/2012 Batch/Seq: 1553 / 136
Received: 12/02/2011 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
ILD982612798	SIEMENS INDUSTRY INC	11/30/2011

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	1500 P	1,500
			Manifest Lbs. Total	1,500

NO SECONDARY COPY AVAILABLE

002684052JJK Shipped: 09/23/2011 COPY 3 DNR Received: 12/30/2011 Batch/Seq: 1551 / 54
Received: 09/29/2011 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	09/23/2011
PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	09/27/2011

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	2000 P	2,000
			Manifest Lbs. Total	2,000

NO SECONDARY COPY AVAILABLE

256

4/14-4/16-1479

001549988GBF Shipped: 08/29/2011 COPY 3 DNR Received: 09/12/2011 Batch/Seq: 1434 / 188
Received: 08/30/2011 TSD EPA ID: WID988580056 TSD Facility Name: BADGER DISPOSAL OF WI INC

Transporter EPA ID	Transporter Name	Transporter Date
WID988580056	BADGER DISPOSAL OF WI INC	08/29/2011

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	55 G	459
			Manifest Lbs. Total	459

[redacted] NO SECONDARY COPY AVAILABLE

008434418JJK Shipped: 03/10/2011 COPY 3 DNR Received: 04/05/2011 Batch/Seq: 1360 / 238
Received: 03/15/2011 TSD EPA ID: WID988580056 TSD Facility Name: BADGER DISPOSAL OF WI INC

Transporter EPA ID	Transporter Name	Transporter Date
WI0000815381	ADVANCED WASTE SERV INC - ADV. WASTE CARRIER	03/11/2011

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	D043- VINYL CHLORIDE	165 G	1,376
			Manifest Lbs. Total	1,376

[redacted] NO SECONDARY COPY AVAILABLE

002684092JJK Shipped: 12/14/2010 COPY 3 DNR Received: 01/11/2011 Batch/Seq: 1302 / 1030
Received: 12/15/2010 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	12/14/2010

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	3000 P	3,000
			Manifest Lbs. Total	3,000

[redacted] NO SECONDARY COPY AVAILABLE

003067839JJK Shipped: 08/20/2010 COPY 3 DNR Received: 09/01/2010 Batch/Seq: 1260 / 209
Received: 08/25/2010 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA

Transporter EPA ID	Transporter Name	Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	08/20/2010

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	2400 P	2,400
			Manifest Lbs. Total	2,400

NO SECONDARY COPY AVAILABLE

003067841JJK Shipped: 08/12/2010 COPY 3 DNR Received: 09/01/2010 Batch/Seq: 1260 / 171
Received: 08/18/2010 TSD EPA ID: MID980991556 TSD Facility Name: EQ DETROIT INC

Transporter EPA ID	Transporter Name	Transporter Date
ILD984785238	HAZCHEM ENVIRONMENTAL CORP	08/12/2010

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	U226- 1,1,1-TRICHLOROMETHANE	15 G	125
			Manifest Lbs. Total	125

NO SECONDARY COPY AVAILABLE

003067836JJK Shipped: 02/22/2010 COPY 3 DNR Received: 03/17/2010 Batch/Seq: 1174 / 94
Received: 03/01/2010 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA

Transporter EPA ID	Transporter Name	Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	02/22/2010

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	4400 P	4,400
			Manifest Lbs. Total	4,400

NO SECONDARY COPY AVAILABLE

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

003067915JJK Shipped: 01/22/2010 COPY 3 DNR Received: 02/19/2010 Batch/Seq: 1166 / 75
Received: 02/02/2010 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA

Transporter EPA ID	Transporter Name	Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	01/22/2010

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	2000 P	2,000
			Manifest Lbs. Total	2,000

NO SECONDARY COPY AVAILABLE

003067911JJK Shipped: 09/22/2009 COPY 3 DNR Received: 10/14/2009 Batch/Seq: 1131 / 911
Received: 10/07/2009 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA

Transporter EPA ID	Transporter Name	Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	09/22/2009

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	2400 P	2,400
			Manifest Lbs. Total	2,400

NO SECONDARY COPY AVAILABLE

003067908JJK Shipped: 06/16/2009 COPY 3 DNR Received: 09/15/2009 Batch/Seq: 1125 / 915
Received: 06/26/2009 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA

Transporter EPA ID	Transporter Name	Transporter Date
INR000022798	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	06/16/2009

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	4400 P	4,400
			Manifest Lbs. Total	4,400

NO SECONDARY COPY AVAILABLE

003067904JJK Shipped: 02/09/2009 COPY 3 DNR Received: 03/06/2009 Batch/Seq: 1029 / 2
Received: 02/19/2009 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA

Transporter EPA ID	Transporter Name	Transporter Date
INR000022798	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	02/09/2009

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	5500 P	5,500
			Manifest Lbs. Total	5,500

NO SECONDARY COPY AVAILABLE

004660924JJK Shipped: 02/02/2009 COPY 3 DNR Received: 03/06/2009 Batch/Seq: 1029 / 230
Received: 02/09/2009 TSD EPA ID: MID000724831 TSD Facility Name: MICHIGAN DISPOSAL

Transporter EPA ID	Transporter Name	Transporter Date
ILD984785238	HAZCHEM ENVIRONMENTAL CORP	02/02/2009
MID000263871	EQ INDUSTRIAL SERVICES INC	02/03/2009

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	2	F001- SPENT HALO SOLVENTS USED IN DEGREASING	1500 P	1,500
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	1500 P	1,500
			Manifest Lbs. Total	3,000

NO SECONDARY COPY AVAILABLE

004660925JJK Shipped: 02/02/2009 COPY 3 DNR Received: 02/13/2009 Batch/Seq: 1026 / 817
Received: 02/03/2009 TSD EPA ID: MID980991566 TSD Facility Name: EQ DETROIT INC

Transporter EPA ID	Transporter Name	Transporter Date
ILD984785238	HAZCHEM ENVIRONMENTAL CORP	02/02/2009

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	U226- 1,1,1-TRICHLOROMETHANE	10	10
			Manifest Lbs. Total	10

NO SECONDARY COPY AVAILABLE

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

003067902JJK Shipped: 01/07/2009 COPY 3 DNR Received: 02/03/2009 Batch/Seq: 1025 / 1000
Received: 01/09/2009 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
INR000022798	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	01/07/2009

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	7200 P	7,200
			Manifest Lbs. Total	7,200

NO SECONDARY COPY AVAILABLE

004698470JJK Shipped: 10/20/2008 COPY 3 DNR Received: 12/09/2008 Batch/Seq: 1014 / 735
Received: 11/07/2008 TSD EPA ID: MID000724831 TSD Facility Name: MICHIGAN DISPOSAL

Transporter EPA ID	Transporter Name	Transporter Date
ILD984785238	HAZCHEM ENVIRONMENTAL CORP	10/20/2008
MID000263871	EQ INDUSTRIAL SERVICES INC	10/29/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	2	F001- SPENT HALO SOLVENTS USED IN DEGREASING	175 G	1,460
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	200 P	200
			Manifest Lbs. Total	1,660

NO SECONDARY COPY AVAILABLE

004698471JJK Shipped: 10/20/2008 COPY 3 DNR Received: 12/09/2008 Batch/Seq: 1014 / 734
Received: 10/29/2008 TSD EPA ID: MID980991566 TSD Facility Name: EQ DETROIT INC

Transporter EPA ID	Transporter Name	Transporter Date
ILD984785238	HAZCHEM ENVIRONMENTAL CORP	10/20/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	U226- 1,1,1-TRICHLOROMETHANE	55 G	459
			Manifest Lbs. Total	459

NO SECONDARY COPY AVAILABLE

004688082JJK Shipped: 07/14/2008 COPY 3 DNR Received: 08/26/2008 Batch/Seq: 997 / 940
Received: 07/15/2008 TSD EPA ID: MID000724831 TSD Facility Name: MICHIGAN DISPOSAL

Transporter EPA ID	Transporter Name	Transporter Date
WI0000815381	ADVANCED WASTE SERV INC - ADV. WASTE CARRIER	07/14/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	55 G	459
1	2	F001- SPENT HALO SOLVENTS USED IN DEGREASING	300 P	300
			Manifest Lbs. Total	759

NO SECONDARY COPY AVAILABLE

003067901JJK Shipped: 06/30/2008 COPY 3 DNR Received: 07/25/2008 Batch/Seq: 992 / 166
Received: 07/03/2008 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
INR000022798	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	06/30/2008
PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	07/01/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	1200 P	1,200
			Manifest Lbs. Total	1,200

NO SECONDARY COPY AVAILABLE

002873807JJK Shipped: 04/16/2008 COPY 3 DNR Received: 07/03/2008 Batch/Seq: 989 / 314
Received: 05/08/2008 TSD EPA ID: MID000724831 TSD Facility Name: MICHIGAN DISPOSAL

Transporter EPA ID	Transporter Name	Transporter Date
WI0000122358	FUTURE ENVIRONMENTAL INC	04/16/2008
TXR000077970	VEOLIA ES INDUSTRIAL SERVICES INC	04/30/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	2	F001- SPENT HALO SOLVENTS USED IN DEGREASING	5000 P	5,000
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	800 P	800
			Manifest Lbs. Total	5,800

NO SECONDARY COPY AVAILABLE

HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR
SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

002873808JJK Shipped: 04/16/2008 COPY 3 DNR Received: 06/03/2008 Batch/Seq: 986 / 887
Received: 05/06/2008 TSD EPA ID: MID980991566 TSD Facility Name: EQ DETROIT INC

Transporter EPA ID	Transporter Name	Transporter Date
WI0000122358	FUTURE ENVIRONMENTAL INC	04/16/2008
TXR000077970	VEOLIA ES INDUSTRIAL SERVICES INC	04/30/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	U225- TRIBROMOMETHANE	200 P	200
			Manifest Lbs. Total	200

[redacted] NO SECONDARY COPY AVAILABLE [redacted]

003067929JJK Shipped: 01/15/2008 COPY 3 DNR Received: 01/25/2008 Batch/Seq: 953 / 1633
Received: 01/17/2008 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date
INR000022798	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	01/15/2008

Page No.	Line No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	6000 P	6,000
			Manifest Lbs. Total	6,000

[redacted] NO SECONDARY COPY AVAILABLE [redacted]

NOT FORWARDED TO WDNR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WID006097281	2. Page 1 of 1	3. Emergency Response Phone (800) 338-3975	4. Manifest Tracking Number 003067844 JJK

5. Generator's Name and Mailing Address: BRUCE KEYES, CERCIBLE MATERIALS CORPORATION - ENVIRONMENTAL RESPONSE TRUST c/o FOLEY & LARDNER LLP, 777 EAST WISCONSIN AVE, MILWAUKEE WI 53202
Generator's Site Address (if different than mailing address): TREAT TO BE PLANT 1, 2188 CHURCH ST, EAST TROY WI 53120
Generator's Phone:

6. Transporter 1 Company Name: SIEMENS WATER TECHNOLOGIES — U.S. EPA ID Number: PAD 981739488
7. Transporter 2 Company Name — U.S. EPA ID Number:
8. Designated Facility Name and Site Address: SIEMENS WATER TECHNOLOGIES, 118 Park RD, DARLINGTON, PA 16115 — U.S. EPA ID Number: PAD987270725
Facility's Phone: (724) 827-9181

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. HAZARDOUS WASTE SOLID, N.O.S. (TCE, 1,1-TCA), CLASS 9, NA3077, PG III	012	DM	04800	P	D039	F001	F002	U226
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
SPENT ACTIVATED CARBON
Profile # USFW-TREIWI-GW-470063 NET QTY. 3,910 LB

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: TINA REED — Signature: Tina Reed, Representative — Month / Day / Year:

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. — Port of entry/exit: — Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: PHILIP COFFMAN FOR SWT — Signature: [signature] — Month / Day / Year: 03 / 22 / 11
Transporter 2 Printed/Typed Name — Signature — Month / Day / Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Arrived without Generator Phone number
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month / Day / Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H039 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Glenn Tanner — Signature: [signature] — Month / Day / Year: 3 / 28 / 11

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

NOT FORWARDED TO WDNR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WID006097781	2. Page 1 of 1	3. Emergency Response Phone 1800-889-3975	4. Manifest Tracking Number 003067844 JJK

GENERATOR

5. Generator's Name and Mailing Address: BRUCE KEYES
CRUCIBLE MATERIALS CORPORATION ENVIRONMENTAL RESPONSE TRUST C/O FOLEY & LARDNER LLP
777 EAST WISCONSIN AVE, MILWAUKEE WI 53202
Generator's Phone:

Generator's Site Address (if different than mailing address)
TEST TO BE PLANT 1
2188 CHURCH ST
EAST TROY WI 53120

6. Transporter 1 Company Name: SIEMENS WATER TECHNOLOGIES — U.S. EPA ID Number: PAD 981739188

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: SIEMENS WATER TECHNOLOGIES — U.S. EPA ID Number
110 PINEY RD
PARKER TWP, PA 16115
Facility's Phone: (724) 822-8181 — PAD 987270725

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
1.	HAZARDOUS WASTE SOLID N.O.S. (TCE, 1,1,1-TCA), CLASS 9, NA3077, PG III	012	DM	04800	P	F001	F002	U226
						U228		
2.								
3.								
4.								

14. Special Handling Instructions and Additional Information
SPENT ACTIVATED CARBON
PROFILE # USFW-TRE1WI-GW-470C3 NET WT. 3,910 LB

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: GINA REESE — Signature: Gina Reese Representative — Month / Day / Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: PHILIP GOFF PRINT FOR SIGNATURE — Signature — Month / Day / Year: 03 / 22 / 11
Transporter 2 Printed/Typed Name — Signature — Month / Day / Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
MANIFEST ARRIVED WITHOUT GENERATOR PHONE NUMBER
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month / Day / Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H039 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Glenn Tanner — Signature — Month / Day / Year: 03 / 28 / 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

NOT FORWARDED TO WDNR

ase print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WID006097281	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number 003067853 JJK

5. Generator's Name and Mailing Address
Crucible Materials Corporation Environmental Response Trust (CMERT)
Foley & Lardner, LLC, Milwaukee, WI 53202

Generator's Site Address (if different than mailing address)

Generator's Phone: 414-297-5792

6. Transporter 1 Company Name: ETC Logistics LLC — U.S. EPA ID Number: OHR000107847

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
Siemens Industry, INC
118 Park Road
Darlington, PA
Facility's Phone: 724-827-8181
U.S. EPA ID Number: PAD987270725

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. R.Q. Hazardous Waste, Solid N.O.S. Spent Carbon Containing TCE, 9, NA3077, PG III	006	DM	est 2600	P	F001 D022 F002 U228
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Wear Proper PPE when handling ERG # 171 NET WT. 2,240 lb
Profile # USFW-TCEIW1-GW 52329

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tina A. Reese Agent for CMERT — Signature: [signature] — Month 10 Day 17 Year 12

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ross Gregory Utz — Signature: [signature] — Month 12 Day 17 Year 12
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Section 2 and 3 Arrived incomplete Section 15 Date should read 12-17-12
Section 5 Street Address should read 777 East Wisconsin Ave / Manifest Reference Number: Revised per Tina Reese

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H039			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Glenn Tonkoff — Signature: [signature] — Month 1 Day 9 Year 13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

NOT FORWARDED TO WDNR

ase print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID006097281

2. Page 1 of

3. Emergency Response Phone

4. Manifest Tracking Number: 003067853 JJK

5. Generator's Name and Mailing Address: Crucible Materials Corporation Environmental Response Trust (CMERT) Foley & Lardner, LLC, Milwaukee, WI 53202

Generator's Site Address (if different than mailing address)

Generator's Phone: 414-297-5792

6. Transporter 1 Company Name: ETC Logistics LLC — U.S. EPA ID Number: OHR000107847

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Siemens Industry, INC 118 Park Road Darlington, PA — U.S. EPA ID Number: PAD 987270725

Facility's Phone: 724-827-8181

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. R.Q. Hazardous Waste, Solid N.O.S. Spent Carbon Containing TCE, 9, NA3077 PG III	006	DM	~~551~~ 2600	P	F001 D039 F002 U228
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: Wear Proper PPE When handling ERG # 171 Profile # USFW-TREIWI-GW 52329 ~~[illegible]~~ NET WT. 2,240 lb

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tina A. Reese Agent for CMERT — Signature: Tina A. Reese — Month Day Year: 10 17 12

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: ~~Don~~ Gregory Utz — Signature: [signature] — Month Day Year: 12 17 12
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Section 2 and 3 Arrived incomplete. Section 5 street address should read 777 East Wisconsin Ave / Section 15 Date should read 12-17-12. Manifest Reference Number: Resolved Per TINA Reese

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H039 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Glenn Tgraff — Signature: [signature] — Month Day Year: 1 9 13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY'S COPY

NOT FORWARDED TO WDNR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WIR 000121202	2. Page 1 of 1	3. Emergency Response Phone 800-887-7570	4. Manifest Tracking Number 003067843 JJK

GENERATOR

5. Generator's Name and Mailing Address: BRUCE KEYES, CERTAINTEED CORPORATION ENVIRONMENTAL RESPONSE TRUST c/o FOLEY & LARDNER LLP, 777 EAST WISCONSIN AVE, MILWAUKEE, WI 53202
Generator's Phone:

Generator's Site Address (if different than mailing address): TRENT TUBE PLANT 3, 2084 ENERGY DRIVE, EAST TROY, WI 53120

6. Transporter 1 Company Name: SIEMENS WATER TECHNOLOGIES CORP | U.S. EPA ID Number: PAD 981739188

7. Transporter 2 Company Name | U.S. EPA ID Number

8. Designated Facility Name and Site Address: SIEMENS WATER TECHNOLOGIES, 118 Ponte Rd, Coraopolis PA 15108
Facility's Phone: 724 827-8181 | U.S. EPA ID Number: PAD 987270725

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. RQ, HAZARDOUS WASTE, Solid, N.O.S., (TCE CARBON), 9, UN3077, PGIII	010	DM	05000	P	F001	F002	U226
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
PROFILE # USFW-TRE3WE-GW-47064 NET WT. 3,373 G

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: TINA REESE | Signature: Tina Reese, representative | Month | Day | Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Phillip Gast AGENT FOR SWT | Signature | Month: 03 | Day: 22 | Year: 11

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Arrived without a Generator Phone number
Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H039			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Glenn Tanner | Signature | Month: 3 | Day: 28 | Year: 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

NOT FORWARDED TO WDNR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WIR 000121202	2. Page 1 of 1	3. Emergency Response Phone 800-889-7975	4. Manifest Tracking Number 003067843 JJK

GENERATOR

5. Generator's Name and Mailing Address: BRUCE KEYES, COOPER MATTHEWS CORPORATION ENVIRONMENTAL RESPONSE TRUST C/O FOLEY & LARDNER LLP, 777 EAST WISCONSIN AVE, MILWAUKEE, WI 53202
Generator's Phone:

Generator's Site Address (if different than mailing address): TRENT TUBE PLANT 3, 2084 ENERGY DRIVE, EAST TROY, WI 53120

6. Transporter 1 Company Name: SIEMENS WATER TECHNOLOGIES CORP — U.S. EPA ID Number: PAD 981739188

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: SIEMENS WATER TECHNOLOGIES, 118 PONTE RD, DONLINGTON, PA 16115 — U.S. EPA ID Number: PAD 987270725
Facility's Phone: 724 827-8181

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. RQ, HAZARDOUS WASTE, Solid, N.O.S., (TCE CARBON), 9, UN3077, PGIII	010	DM	05000	P	F001	F002	U226
						U228		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
PROFILE # USFW-TRE3WE-GW-47064 NET WT. 3,373 G

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: TINA REESE — Signature: Tina Reese, representative — Month / Day / Year:

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: PHILIP COLE ASST FOLSUM — Signature: [signature] — Month: 03 Day: 22 Year: 11
Transporter 2 Printed/Typed Name — Signature — Month / Day / Year:

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Arrived without a Generator Phone number
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month / Day / Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H039 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Glenn Tanner — Signature: [signature] — Month: 3 Day: 28 Year: 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	W I D 0 0 6 0 9 2 8 4 1	1	[illegible]	015499388 GBF

GENERATOR

5. Generator's Name and Mailing Address: [illegible] Generator's Site Address (if different than mailing address)

Generator's Phone: [illegible]

6. Transporter 1 Company Name: Badger Disposal of WI Inc — U.S. EPA ID Number: WID[illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI Inc, 7511 West Hemlock Street, Marshfield WI 54449 — U.S. EPA ID Number: WID[illegible]

Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. NONHAZ Hazardous waste, solid, n.o.s. (Paint, Mineral Spirits) 9 PGIII	1	DM	3	G	D001
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] Signature: [illegible] Month Day Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: [illegible] Signature: [illegible] Month Day Year

Transporter 2 Printed/Typed Name: Signature: Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Signature: Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
W I D [illegible]	1	[illegible]	01549588 GBF

5. Generator's Name and Mailing Address [illegible]
[illegible]
[illegible]
[illegible] WI [illegible]

Generator's Site Address (if different than mailing address)

Generator's Phone: 414 [illegible]

6. Transporter 1 Company Name: Badger Disposal of WI Inc. — U.S. EPA ID Number: W I D [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
Badger Disposal of WI Inc.
[illegible] West Hemlock Street
Milwaukee WI [illegible]
Facility's Phone: [illegible]

U.S. EPA ID Number: W I [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ NA3077, Hazardous waste, solid n.o.s. ([illegible]) ([illegible]) 9, PGIII	1	DM	55	[illegible]	[illegible] [illegible]
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
[illegible]

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] — Signature: [illegible] — Month / Day / Year

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] — Signature: [illegible] — Month / Day / Year: [illegible] 29 [illegible]
Transporter 2 Printed/Typed Name — Signature — Month / Day / Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month / Day / Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month / Day / Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

NOT FORWARDED TO WDNR

Invoice: 40240918 Receipt 02-21 475131 Manifest 003067840JJK

Please print or type. (Form designed for use on elite)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID006097...

Page 1 of

3. Emergency Response Phone: 800 458-1910

4. Manifest Tracking Number: 003067840 JJK

5. Generator's Name and Mailing Address: Crucible Materials Attn: Dona Zilles 575 State Fair Blvd Syracuse NY 13209

Generator's Phone: 262 642 8369

Generator's Site Address (if different than mailing address): Fremont Trout Tube Plant 2188 Church St East Troy, WI 53120

6. Transporter 1 Company Name: Heritage ENV.

U.S. EPA ID Number: ILD 984 858 238

7. Transporter 2 Company Name: EQ Industrial Services

U.S. EPA ID Number: MIO 000 273 891

8. Designated Facility Name and Site Address: Michigan Disposal Waste Treatment Pl 49350 N I-94 Service Drive Belleville, MI 48111 (800) 592-5489

U.S. EPA ID Number: MID000724831

Facility's Phone:

	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
1.	NA 3077 Hazardous Waste, Solid, NOS, 9 PG III	10	DM	50000	P	F001	F006	D008
2.	NA 3077 Hazardous Waste, Liquid, NOS, 9 PG III	1	DM	250	P	F001	F006	D008
3.								
4.								

10 DM 50000 P

1 DM 250 P

14. Special Handling Instructions and Additional Information

01. 07300 MGB/System Sludge/ERG #171

02. 07300 EAB/PPE/Filters/ERG #171

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Dona Zilles

Signature: Dona Zilles

Month: 8 Day: 31 Year: 10

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Willard Fabi

Signature:

Month: 8 Day: 31 Year: 10

Transporter 2 Printed/Typed Name: Ryan Rushman

Signature:

Month: 9 Day: 1 Year: 10

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)

U.S. EPA ID Number:

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H075 2. H075 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Leon Lehig

Signature:

Month: 9 Day: 25 Year: 10

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

GENERATOR | TRANSPORTER | INTL | DESIGNATED FACILITY

3527118

NOT FOR MANIFEST SO WORK

Invoice: 40240918 Receipt 02-21 475131 Manifest 003067840JJK

Please print or type. (Form designed for use on elite)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID006097...

2. Page 1 of

3. Emergency Response Phone: 330 456-1910

4. Manifest Tracking Number: 003067840 JJK

5. Generator's Name and Mailing Address: Crucible Materials Attn: Donia Zilles 575 State Fair Syracuse NY 13209 Generator's Phone: 262 642 8369

Generator's Site Address (if different than mailing address): Former Talbot Mill Plant 1 2188 Church ST East Troy, WI 53120

6. Transporter 1 Company Name: Hazchem ENV.

U.S. EPA ID Number: ILD984935238

7. Transporter 2 Company Name: EQ Industrial Services

U.S. EPA ID Number: MIO 000 203 871

8. Designated Facility Name and Site Address: Michigan Disposal Waste Treatment Pl 49350 N I-94 Service Drive Belleville, MI 48111 Facility's Phone: (800) 592-5489

U.S. EPA ID Number: MID000724831

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
1	UN [illegible] Hazardous Waste, Solid, NOS, 9 PG III	10	DM	5000	LBS	F001	F002	D018
2	NA 3077 Hazardous Waste, Liquid, NOS, 9 PG III	1	DM	250 GAL 5000	LBS	F001	F002	D018
3.								
4.								

10 DM 5000 P

1 DM 250 P

14. Special Handling Instructions and Additional Information

01. 07300 MGB / System Sludge / ERG #171

02. 07300 EAB / PPE / Filters / ERG #171

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Donia Zilles Signature: Donia Zilles Month: 8 Day: 13 Year: 10

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: William Fish Signature: Month: 8 Day: 24 Year: 10

Transporter 2 Printed/Typed Name: Ryan Rushman Signature: Month: 8 Day: 18 Year: 10

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H075 2. H075 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Lenny Lehig Signature: Month: 8 Day: 25 Year: 10

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